


FILED

MAY 07 2025

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY  DEP CLK

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Taurean Small, Plaintiff

v.

OpenAI LP, OpenAI Inc., Microsoft Corporation, Google LLC, Meta Platforms, Inc.,
Amazon.com, Inc., Adobe Inc., Defendants

COMPLAINT

JURISDICTION AND VENUE

This Court has subject matter jurisdiction under 28 U.S.C. § 1331 because this action arises under the Constitution and laws of the United States. This Court also has supplemental jurisdiction over state law claims under 28 U.S.C. § 1367. Venue is proper in this district under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred in this district.

PARTIES

Plaintiff Taurean Small is a resident of Fayetteville, North Carolina. Defendants are technology corporations with operations and data infrastructure impacting residents of this district.

DEFINITIONS

'Cognitive Labor' refers to the behavioral, emotional, linguistic, and logical expressions contributed by users during interaction with AI-enabled systems. 'AI Infrastructure' includes models, data pipelines, and algorithms trained on human inputs. 'Digital Inputs' refers to text, speech, emotional patterns, decision logic, and metadata generated by Plaintiff during use of interactive systems.

FACTUAL ALLEGATIONS

Between 2023 and 2025, Plaintiff interacted with multiple platforms controlled by Defendants, during which his cognitive labor and digital behavior were captured, analyzed, and integrated into AI products and services. This usage generated commercial advantage to Defendants while denying Plaintiff compensation, licensing terms, or opt-out mechanisms.

CLAIMS FOR RELIEF

Count 1: Violation of the Stored Communications Act (18 U.S.C. § 2701)
Count 2: Violation of the Computer Fraud and Abuse Act (18 U.S.C. § 1030)
Count 3: Violation of North Carolina Unfair and Deceptive Trade Practices Act
Count 4: Constructive Exploitation of Cognitive Labor
Count 5: Hybrid Agency-Enabling Theory of Liability

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court: (a) Award compensatory and statutory damages in the amount of \$100,000,000; (b) Grant royalties of 1.5% on revenues tied to Plaintiff's data or input-derived AI outputs; (c) Order disgorgement of profits and unjust enrichment; (d) Issue declaratory relief establishing cognitive labor rights; (e) Grant reasonable attorney's fees and costs under 28 U.S.C. § 1920; (f) Provide such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

Taurean Small

Taurean Small

303 Longbranch Ct

Fayetteville, NC 28303

(472) 234-3575

CogLabEth@yahoo.com

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